

**OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**

SUZANNE L. MARTIN (Nevada Bar No. 8833)

Wells Fargo Tower, Ste. 1500

3800 Howard Hughes Parkway

Las Vegas, NV 89169

Telephone: (702) 369-6800

Facsimile: (702) 369-6888

Email: suzanne.martin@ogletreedeakins.com

**AKIN GUMP STRAUSS HAUER & FELD LLP**

SHAWN HANSON (admitted *pro hac vice*)

580 California Street, Suite 1500

San Francisco, CA 94104

Telephone: (415) 765-9500

Facsimile: (415) 765-9501

Email: shanson@akingump.com

Attorneys for Defendants My Left Foot Children's  
Therapy, LLC, Jon Gottlieb, and Ann Marie Gottlieb

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA AND  
THE STATE OF NEVADA *ex rel.* MARY  
KAYE WELCH,

Plaintiffs,

v.

MY LEFT FOOT CHILDREN'S  
THERAPY, LLC, et al.,

Defendants.

Case No. 2:14-cv-01786-MMD-GWF

**JOINT STIPULATION AND ORDER TO  
SET BRIEFING SCHEDULE FOR  
PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

**[SECOND REQUEST]**

The parties, through undersigned counsel, stipulate as set forth herein. Plaintiff Mary Kaye Welch ("Plaintiff") filed a motion for partial summary judgment on Monday, November 20, 2017 (ECF No. 133). The parties have agreed to and propose a briefing schedule for the opposition and reply that differ from the Local Rules.

Pursuant to Local Rule IA 6-1 and 26-4, this is the parties' second request. The first request was granted on November 22, 2017 (ECF No. 137). Pursuant to the previous request, Defendants' opposition is currently due on January 2, 2018, and Plaintiffs' reply is due on January 23, 2018. The

1 additional time is necessary because the deposition of Plaintiff, taken on November 28, 2017, was not  
2 completed at that time, and the parties have agreed to resume the deposition on December 19, 2017.  
3 In addition to the parties' counsel's work schedules and the upcoming holiday season, additional time  
4 is needed to receive and review the deposition transcript and incorporate it into the briefing. The  
5 parties believe that the additional time will be sufficient for both parties to properly brief their  
6 positions. This request is made in good faith and not for the purposes of delay.

7 Accordingly, the parties hereby stipulate:

8 The parties agree to extend the time for Defendants to file the opposition to **January 18, 2018**.

9 The parties agree to extend the time for Plaintiff to file her reply to **February 8, 2018**.

10 Dated: December 4, 2017

11 **IT IS SO STIPULATED:**

12 By: /s/ David Scher

13 L. Timothy Terry, Esq.  
14 The Terry Law Firm, Ltd  
15 102 N. Curry Street  
16 Carson City, NV 89703  
17 tim@theterrylawfirm.com  
18 Telephone: (775) 883-2348  
19 Facsimile: (775) 883-2347

20 David Scher (admitted *pro hac vice*)  
21 R. Scott Oswald (admitted *pro hac vice*)  
22 Andrew Witko (admitted *pro hac vice*)  
23 The Employment Law Group, P.C.  
24 soswald@employmentlawgroup.com  
25 dscher@employmentlawgroup.com  
26 awitko@employmentlawgroup.com  
27 888 17th Street, NW, Suite 900  
28 Washington, DC 20006  
Telephone: (202) 331-2883  
Facsimile: (202) 261-2835

Attorneys for Plaintiff/Relator Mary  
Kaye Welch

By: /s/ Shawn Hanson

Shawn Hanson (admitted *pro hac vice*)  
Akin Gump Strauss Hauer & Feld LLP  
580 California Street, Suite 1500  
San Francisco, CA 94104  
Tel: 415-765-9500  
Fax: 415-765-9501

Suzanne L. Martin  
Ogletree, Deakins, Nash, Smoak, & Stewart, P.C.  
suzanne.martin@ogletreedeaakins.com  
Wells Fargo Tower  
3800 Howard Hughes Pkwy, Suite 1500  
Las Vegas, NV 89169  
Tel: 702-369-6800  
Fax: 702-369-6888

Attorneys for Defendants My Left Foot  
Children's Therapy, LLC, Jon Gottlieb and Ann  
Marie Gottlieb

**ORDER**

**IT IS SO ORDERED:**

DATED: December 4, 2017

By:   
U.S. DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

***United States of America and State of Nevada ex rel. Welch v.  
My Left Foot Children's Therapy, LLC, et al.***  
**U. S. District Court of Nevada Case No. 2:14-cv-01786-MMD-GWF**

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is: 580 California Street, Suite 1500, San Francisco, California 94104. On December 4, 2017, I served the foregoing document described as:

**JOINT STIPULATION AND ORDER TO SET BRIEFING SCHEDULE FOR  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT [SECOND  
REQUEST]**

on the interested parties below, using the following means:

**All parties identified for Notice of Electronic Filing generated by the Court's  
CM/ECF system under the above-referenced case caption and number**

BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document to be sent to the respective e-mail addresses of the parties as stated above.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury that the foregoing is true and correct. Executed on December 4, 2017, at San Francisco, California.

  
Lorraine France-Gorn